

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, JOHN  
MEINERS, and DANIEL UMPA, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

NATIONAL ASSOCIATION OF  
REALTORS, et al.,

Defendants.

Civil Action No. 4:23-cv-00788-SRB

[Consolidated with 4:23-cv-00945-SRB]

Hon. Stephen R. Bough

**NOTICE OF PENDING SETTLEMENT, JOINT MOTION TO CONTINUE TO STAY  
CASE AS TO DEFENDANT HANNA HOLDINGS, INC., AND JOINT STATUS  
REPORT**

Plaintiffs Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively “Plaintiffs”) and Defendant Hanna Holdings, Inc. (“Howard Hanna,” and together with Plaintiffs, the “Parties”), respectfully write to update the Court on the Parties’ agreement in principle to settle all claims asserted against Howard Hanna in this action as part of a proposed nationwide class settlement. This agreement is subject to the Court’s approval under Rule 23 of the Federal Rules of Civil Procedure.

As the Parties previously informed the Court in their May 2, 2025 Notice of Pending Settlement and Joint Motion to Stay Case (ECF No. 733), Plaintiffs and Howard Hanna have reached an agreement in principle to settle all claims. The Parties continue to negotiate the terms of that settlement agreement in good faith. The Parties hereby jointly stipulate and request that the Court continue to stay all deadlines and proceedings solely as to Howard Hanna to preserve the resources of Plaintiffs, Howard Hanna, and the Court, and to seek approval of the settlement. The Parties agree that this Notice and the stay requested herein shall not constitute a waiver of any defenses, including but not limited to: (a) any jurisdictional defenses that may be available under Rule 12 of the Federal Rules of Civil Procedure, statutory law, or common law (including but not limited to personal jurisdiction defenses), (b) any affirmative defenses that may be available under Rule 8 of the Federal Rules of Civil Procedure, statutory law, or common law, or (c) any other statutory or common law defenses that may be available to Hanna Holdings in this or any other related actions.

Dated: June 2, 2025

Respectfully submitted by:

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**CERTIFICATE OF SERVICE**

The undersigned attorney of record hereby certifies that on June 2, 2025, a true and correct copy of the foregoing was filed electronically by the Court's CM/ECF system, which caused notice and a copy of this filing to be sent to all counsel of record.

Dated: June 2, 2025

/s/ David Z. Gringer

David Z. Gringer